

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

TONY RAPATZ, ALICE GUERRA, and
KATHERINE GUERRA,

Plaintiffs,

vs.

Case No. 1:12-CV-827-

RHS/SMV

JOE MARTINEZ, individually;

CHRISTIAN LOPEZ, individually;

ROBERT VIGIL, individually;

DANNY PACHECO, individually; and

CITY OF ESPANOLA EMPLOYEES and SUPERVISORS JOHN/JANE DOES 1 through 5,
individually,

Defendants.

JOINT DISCOVERY STATEMENT

Pursuant to this Court Order [*Doc.163*] the below listed counsel submits this joint statement regarding their March 12, 2015 good faith meeting discussing each discovery dispute that is the subject of Plaintiffs' Motions to Compel [*Doc.156, Doc.157 and Doc.158*]:

1. Nathaniel V. Thompkins
NEW MEXICO FIRM, LLC
103 St. Francis Drive, Unit A
Santa Fe, NM 87501
505-988-9750
Fax: (866) 657-8780
Email: nate@newmexicofirm.com
Attorney for Plaintiffs

2. Robert L. Cole
ROBERT L. COLE LAW OFFICES
PO Box 50129
Albuquerque, NM 87181
Email: rlc@rcolelaw.com
Attorneys for Defendants City of Espanola, et al.

GOOD FAITH MEETING

Counsels met on March 12, 2015 and discussed the discovery issues regarding the Defendant City of Espanola, Defendant Robert Vigil and Defendant Danny Pacheco's discovery answers and responses. Defendants counsel pointed out areas of confusion regarding certain of Plaintiffs' interrogatories. Plaintiffs' counsel, after the meeting, wrote a letter to Defendants' counsel in attempt to clarify those interrogatories that he understood might be confusing. Counsel for the Defendants replied via e-mail that he was hoping that those interrogatories and requests for production of documents would be re-worded and resubmitted. Upon resubmission, defense counsel would meet with each of his clients and answer those interrogatories and respond to those requests for production. Defense counsel also agreed that some of the answers and responses could have been answered more completely or clearly. To that end defense counsel agreed to meet with his clients and revisit and clarify all of the answers and responses, not only those to which objection have been raised.

Counsels for both Plaintiffs and Defendants were therefore not able to resolve any of the outstanding issues regarding the current discovery dispute.

Submitted By:
NEW MEXICO FIRM, LLC

By: /s/ Nathaniel V. Thompson
Nathaniel V. Thompson
103 St. Francis Drive, Unit A
Santa Fe, NM 87501
505-988-9750
Fax: (866) 657-8780
Email: nate@newmexicofirm.com
Attorney for Plaintiffs

Submitted by:
ROBERT L. COLE LAW OFFICES

By: /s/ Robert L. Cole
Robert L. Cole
PO Box 50129
Albuquerque, NM 87181
Email: rlc@rcolelaw.com
Attorneys for Defendants City of Espanola, et al.